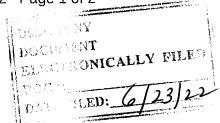
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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK



JUNE E. ADAMS IRREVOCABLE TRUST DATED 7/21/14 FBO EDWARD ROBERT ADAMS, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

vs.

INTERNATIONAL BUSINESS MACHINES CORPORATION, VIRGINIA M. ROMETTY, MARTIN J. SCHROETER, JAMES J. KAVANAUGH and ARVIND KRISHNA,

Defendants.

Civil Action No. 7:22-cv-02831-VB

CLASS ACTION

[PROPOSED] ORDER GRANTING MOTION FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL Case 7:22-cv-02831-VB Document 34 Filed 06/23/22 Page 2 of 2

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Having considered Iron Workers Local 580 Joint Funds' Motion for Appointment as Lead

Plaintiff and Approval of Lead Plaintiff's Selection of Lead Counsel (the "Motion") and good cause

appearing therefor, the Court ORDERS as follows:

1. The Motion is GRANTED.

2. Iron Workers Local 580 Joint Funds are appointed Lead Plaintiff pursuant to 15

U.S.C. §78u-4(a)(3)(B)(iii).

3. Iron Workers Local 580 Joint Funds' selection of Robbins Geller Rudman & Dowd

LLP as Lead Counsel is hereby approved, pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v). Lead Counsel

shall have the following responsibilities and duties on behalf of Lead Plaintiff and the putative class:

(a) the briefing and argument of any and all motions;

(b) the conduct of any and all discovery proceedings including depositions;

(c) settlement negotiations;

(d) the pretrial discovery proceedings and the preparation for trial and the trial of

this matter, and delegation of work responsibilities to selected counsel as may be required;

(e) the preparation and filing of all pleadings; and

(f) the supervision of all other matters concerning the prosecution or resolution of

the action.

IT IS SO ORDERED.

DATED: June 23, 2022

THE HONORABLE VINCENT L. BRICCETTI

UNITED STATES DISTRICT JUDGE